

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
Fairfield Sentry Limited, et al., : Chapter 15 Case
Debtors in Foreign Proceedings. : Case No. 10-13164 (BRL)
-----X Jointly Administered

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Fairfield Sentry Limited (In : Adv. Pro. No. 10-03634 (BRL)
Liquidation), :
Plaintiff, :
-against- : (District Court Civil Action
Zurich Capital Markets Company, et al., : No. 10-cv-07407)
Defendants. :
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Fairfield Sentry Limited (In : Adv. Pro. No. 10-03635 (BRL)
Liquidation), :
Plaintiff, :
-against- : (District Court Civil Action
ABN AMRO Schweiz AG, et al., : No. 10-cv-07408)
Defendants. :
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Fairfield Sentry Limited (In Liquidation), Fairfield Sigma Limited (In Liquidation) and Fairfield Lambda Limited (In Liquidation), : Adv. Pro. No. 10-03636 (BRL)
Plaintiffs, : (District Court Civil Action No. 10-cv-07410)
-against- :
ABN AMRO Schweiz AG, et al., :
Defendants. :
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NOTICE OF JOINDER IN MOTIONS

(1) TO WITHDRAW THE REFERENCE TO THE UNITED STATES BANKRUPTCY COURT AND (2) TO REMAND AND FOR ABSTENTION

The undersigned counsel hereby provide notice on behalf of their respective clients, all of which are defendants in one or more of the above-captioned actions, of those defendants' joinder in (1) the Motion to Withdraw the Reference to the United States Bankruptcy Court, dated September 20, 2010, which was filed by Cleary Gottlieb Steen & Hamilton LLP ("Cleary") in all three of the above-captioned actions; (2) the Motion to Remand and for Abstention, dated October 4, 2010, which was filed by Cleary in all three of the above-captioned actions; and (3) the Motion to Remand to the Commercial Division of the New York Supreme Court for New York County, dated October 4, 2010, which was filed by Arnold & Porter LLP in the above-captioned action, *Fairfield Sentry Limited (In Liquidation) v. Zurich Capital Markets Company, et al.*, Adv. Pro. No. 10-03634. Those defendants who, by this notice, join in Cleary's and Arnold & Porter's motions are referred to collectively as the "Additional Defendants." The Additional Defendants also incorporate the additional arguments set forth in the companion motions being filed in other related cases.

The Additional Defendants submit this notice and join in Cleary's and Arnold & Porter's motions without prejudice to or waiver of any rights or defenses of the Additional Defendants,

including, without limitation, defenses based upon lack of personal jurisdiction and improper service of process.

Dated: October 7, 2010

Respectfully submitted,

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